

KENNETH K. LIU, ESQ.
 Nevada Bar No. 4466
 819 South Sixth Street
 Las Vegas, Nevada 89101
 (702) 385-0639
 Attorney for Debtor(s)

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

LINDA J. TAYLOR,

Debtor(s)

BK-S-08-25651-LBR
 Chapter 13

Date: November 17, 2009
 Time: 10:30 a.m.

OPPOSITION TO MOTION FOR RELIEF FROM AUTOMATIC STAY
WITH CERTIFICATE OF SERVICE

The above-named debtor, by and through her attorney of record, Kenneth K. Liu, Esq., files this opposition to US Bank's Motion for Relief from Automatic Stay and state as follows:

The Debtor converted her case from Chapter 7 to Chapter 13 on July 30, 2009. In her proposed plan, the Debtor states that she is current with her obligations to US Bank and will continue to make the contractual payments to same. The Debtor does not understand why US Bank filed its Motion for Relief from the Automatic Stay. US Bank contends that the Debtor's intent is to surrender the property located at 3700 W. Bonanza Road, Las Vegas, Nevada. However, the Debtor's Chapter 7 statement of intention (attached as Exhibit A in US Bank's Motion for relief from the automatic stay), clearly states that she intends to retain the house. The Debtor's proposed plan further confirms her intention of retaining the Bonanza property. Furthermore, the Debtor is not behind on her payment obligations to US Bank. Accordingly, the Debtor requests the court US Bank's Motion for relief from the Automatic Stay be denied.

DATED this 29th day of October, 2009.

By /s/ Kenneth K. Liu
 KENNETH K. LIU, ESQ.
 Nevada Bar #4466
 819 South Sixth Street
 Las Vegas, NV 89101
 Attorneys for Debtor

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a copy of the Debtor s opposition to Motion for Relief from Automatic Stay in the above-entitled case was mailed by me the 29th day of October, 2009, by depositing a copy thereof, first-class postage prepaid, in the United States Mail, to the parties listed below:

Gregory L. Wilde, Esq.
208 South Jones Blvd.
Las Vegas, NV 89107

Mark S. Bosco, Esq.
2525 East Camelback Road, Ste. 300
Phoenix, AZ 85016

Dated: 29th day of October, 2009.

/s/ Kenneth K. Liu
An employee of Law Offices of Kenneth K. Liu